



County of Los Angeles
CHIEF ADMINISTRATIVE OFFICE

713 KENNETH HAHN HALL OF ADMINISTRATION • LOS ANGELES, CALIFORNIA 90012
(213) 974-1101
<http://cao.co.la.ca.us>

DAVID E. JANSSEN
Chief Administrative Officer

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August 16, 2004

Airport Land Use Commission
170 Hall of Records
320 West Temple Street
Los Angeles, CA 90012

Dear Airport Land Use Commissioners:

**COUNTY OF LOS ANGELES COMMENTS ON LOS ANGELES
INTERNATIONAL AIRPORT (LAX) MASTER PLAN**

On behalf of the County of Los Angeles, I am submitting Comments on the LAX Master Plan and related documents for consistency with the County's adopted Airport Land Use Plan (ALUP). The comments include findings that the LAX Master Plan is inconsistent with the ALUP.

Sincerely,

A handwritten signature in black ink, reading "David E. Janssen". The signature is fluid and cursive, with a long horizontal stroke at the end.

DAVID E. JANSSEN
Chief Administrative Officer

DEJ:MKZ
JR:os

Enclosure (1)

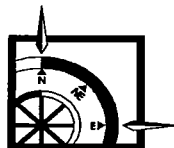
c: Each Supervisor
Executive Officer, Board of Supervisors
County Counsel
Interim Director of Public Works
Director of Regional Planning
A.C. Lazzaretto and Associates

County of Los Angeles

COMMENTS

On the LAX Consensus Plan & Alternative E-1

Prepared By:



A.C. Lazzaretto & Associates

P.O. Box 3073
Burbank, CA 91504
Tel: (818) 569-4526
Fax: (818) 558-7088

Project Manager:
Andrew C. Lazzaretto

11 AUGUST 2004

**County of Los Angeles
Comments on the Consensus Plan and Alternative E-1 Master
Plan Improvements at LAX**

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Acknowledgements

This document has been prepared with
generous assistance from the following:

The Chief Administrative Office of the County of Los Angeles
The Public Works Department of the County of Los Angeles
Austin-Foust Associates
Bauer Environmental Services, Inc.
BoydForbes, Inc.
Mestre-Greve Associates
Michael Brandman Associates

County of Los Angeles

Comments on the Consensus Plan and Alternative E-1 Master Plan Improvements at LAX

I. INTRODUCTION AND BACKGROUND

A.C. Lazzaretto & Associates has been retained by the Los Angeles County Chief Administrative Office to review two recently conceived proposals regarding the Los Angeles International Airport Master Plan process. The proposals include the "LAX Plan" (referred to as the 'Consensus Plan') developed through the efforts of Los Angeles City Councilwoman Cindy Miscikowski, and an alternative LAX Modernization Proposal (identified as 'Alternative Plan E-1' or the 'Parks' Plan') developed through the efforts of Los Angeles City Councilman Bernard Parks. Collectively, the 2 plans are referred to in this report as the 'compromise plans.'

The Consensus Plan was approved by the City of Los Angeles' Board of Airport Commissioners and the City of Los Angeles Planning Commission on 14 June 2004. Thereafter, the Plan was forwarded to the County of Los Angeles Airport Land Use Commission for findings of conformity with the adopted Airport Land Use Plan (ALUP). If found to be consistent with the ALUP, it is anticipated that the Consensus Plan will be presented to the Los Angeles City Council for final approval late in 2004, and to the Federal Aviation Agency for final approval early in 2005. Alternative Plan E-1, which is strongly supported by the Alliance for a Regional Solution to Airport Congestion (ARSAC), has also been presented to the Board of Airport Commissioners for review and consideration as a less costly alternative approach to the modernization of LAX.

Based upon a Board of Supervisors' instruction to the CAO to conduct a review and prepare a report on the Consensus Plan and the Parks' Proposal, the CAO engaged A.C. Lazzaretto & Associates to conduct this review. In particular, the County is interested in the extent to which these plans resolve concerns pertaining to (a) passenger growth at LAX, (b) environmental justice for surrounding residents, (c) compliance with the requirements of CEQA and NEPA, and other key issues identified in the 24 May 2004 report prepared for the County by A.C. Lazzaretto & Associates. The findings in this report are based on review of documents and exhibits provided by Council Members Cindy Miscikowski and Bernard Parks, as well as a 22 July meeting with Councilwoman Miscikowski and David Kissinger of her staff.

Review of the compromise plans offered by Council Members Miscikowski and Parks indicates that both plans seek to resolve significant concerns associated with Master Plan Alternative D, as outlined in the Final EIS/EIR. The strength of the Consensus Plan lies in its establishment of a strong, enforceable and transparent link between certain controversial Master Plan elements and the requirement for future discretionary planning and environmental review, and its incorporation of a process that would allow near-term

initiation of Master Plan improvements at LAX. The main drawback to this plan is its inextricable basis in a flawed project template (Alternative D) and the inadequate environmental information on which that project was developed.

The key strength of the Parks Plan is its incorporation of design modifications that are directly responsive to concerns about security and growth in service levels; the key drawback is that insufficient information is available to confirm that Alternative Plan E-1 would accomplish the apparent benefits, and this plan may have more adverse impacts than Alternative D with respect to environmental justice. The Parks Plan would require substantial new CEQA and NEPA compliance with concomitant delays in Master Plan improvements for LAX, and an uncertain outcome.

II. SUMMARY OVERVIEW OF FINDINGS AND RECOMMENDATIONS

As noted in the Introduction, our review indicates that both the Consensus Plan and Parks' Alternative E-1 were developed with the goal of responding to community concerns and optimizing the Master Planning process for Los Angeles International Airport. Both plans contain excellent concepts, and we are greatly encouraged by the thoughtfulness and level of effort that has been given by Council Members Miscikowski and Parks to find solutions to intractable problems that have developed over the past several years.

However, we conclude that neither plan offers assurance that the concerns raised by the Los Angeles County Board of Supervisors will be resolved with respect to future development of LAX. For the Parks' Plan, this conclusion derives mainly from the absence of sufficient data to analyze potential project impacts and consequences. Our comments are therefore more directly applicable to the Consensus Plan, for which a substantial amount of information is available.

In brief, our review indicates that although the Consensus Plan seeks to establish controls that would govern Master Plan development, these controls will not succeed in averting implementation of LAX Master Plan Alternative D as outlined in the Final EIS/EIR. This conclusion reflects 3 key and irrefutable points:

- Alternative D is a fundamentally flawed project that is based on a fundamentally flawed Final EIS/EIR and environmental review process. The County's concerns regarding the EIS/EIR have been well documented in comment letters dated June 2001, October 2003, and May 2004; and
- The Advanced Planning Contract recently executed between LAWA and DMJM specifically charges DMJM with responsibility for implementing Alternative D, and makes no reference whatsoever to the Consensus Plan; and
- Each and every improvement contained in Alternative D is also contained in the Consensus Plan, and both rely on the same flawed Final EIS/EIR prepared for the LAX Master Plan effort.

Ultimately, we believe that the Consensus Plan as now written will be a tool for implementing Alternative D -- no matter how well intentioned its original conception.

The Consensus Plan will serve its stated goals only if the LAX Master Plan Final EIS/EIR certification is limited *exclusively* to the 'Green Light' projects, with mandatory future environmental review for all 'Yellow Light' components. If LAWA is truly serious about the Consensus Plan, it should undertake whatever steps are necessary to effectuate this outcome -- including recirculation of the Master Plan EIS/EIR to address the environmental implications of this change.

Beyond the central and overriding recommendation outlined above, our review of the compromise plans points to a number of ways in which to strengthen the compromise plans to be more responsive to the County's concerns. Our recommendations are summarized below:

- 1 ► To provide a level of confidence that the Consensus Plan will place reasonable limits on passenger service, we recommend that LAX demand projections be updated by LAWA as part of a transparent analysis of the capacity of the existing facilities. .
- 2 ► To establish more effective limitations on incremental growth at LAX, we recommend that the Consensus Plan provide some indication of the levels of passenger service that would be accommodated by the new gates and terminal space, and require a Specific Plan Amendment for any physical improvements or operational use of the open concrete areas.
- 3 ► We recommend that the Consensus Plan be revised to require a Specific Plan amendment for any cargo-related improvements that would increase total cargo handling above 3 million tons of air cargo. The requirement should incorporate a procedure for monitoring total cargo activity at LAX, including nighttime flights and 24-hour cargo delivery trip counts to monitor cargo-related ground transportation. Information about the proposed Parks Plan should be expanded to describe long-term cargo handling facilities.
- 4 ► Both compromise plans need to compile an inventory of available parking spaces (airport owned and off-airport) and specify the location of future vehicle parking areas to accommodate an additional 23 MAP.
- 5 ► To bridge the gap between security sensitivities and public accountability, the City could create a joint-public interest-monitoring group, possibly as part of the Consensus Plan Stakeholder Process.
- 6 ► Both compromise plans should be revised to sharply limit vehicular access to the Central Terminal area in accordance with evolving risk management considerations.
- 7 ► Both compromise plans should be expanded to clarify the way in which the Concentric Circle Surveillance Concept will be implemented at LAX.
- 8 ► The same priority should be given to vehicle bombs as to other types of attack modes and weaponry, including biological, chemical and nuclear weapons.
- 9 ► It is hoped that the Rand Corporation study will identify the steps required to protect the Central Terminal Area from a successful vehicle bomb attack, as well as other modes affecting the interior of the buildings.
- 10 ► Before LAWA enters into a commitment on the security program for LAX, the County should be given an opportunity to complete a full review of the Rand study output, and to offer comments as appropriate based on that review.

- 11 ►** The Consensus Plan-Specific Plan text description of traffic analysis phasing and mitigation (last sentence) should be revised to replace "may" with "will."
- 12 ►** The Consensus Plan should clearly define 'net new airport peak hour trips in excess of 8,236' as including all vehicle trips on all traffic lanes at key intersections utilized to access the airport. Truck trips should be converted to Passenger Car Equivalents (PCE) when calculating the net new airport peak hour vehicle trips at these key intersections. The Consensus Plan should clearly define how the increase in annual passengers at LAX will be measured, and delineate the criteria to be used for predicting these increases.
- 13 ►** If the Lennox interchange is retained as a mitigation feature, we recommend a review of its relationship to the circulation system west of the I-405; the road system in this area may need to be reconfigured to make it fully effective.
- 14 ►** Base year data for noise and air quality should be updated, and differences between the measured and modeled noise levels should be reconciled, and results of these efforts should be presented to the public.
- 15 ►** We recommend that the City of Los Angeles reassess the proposed deletion of the RW 24L extension or reevaluate the air quality impacts associated with continued long aircraft taxi distances. Taxi distances should be held to a minimum and air quality and operational impacts should be reassessed if RW 24L is not extended.
- 16 ►** To address concerns that the existing Airport Noise Abatement Program may be used by some local agency personnel to inspect for code violations and enforcement, the City should put into practice a training curriculum for all personnel charged with program implementation. This would increase program participation rates and ultimately result in reduced noise impacts to impacted communities.
- 17 ►** The Ground Transportation Center (GTC) should be eliminated from the Consensus Plan, and the Manchester Square area instead be used to mitigate impacts on environmental justice and neighborhood compatibility. This mitigation should take the form of a mixed use project that promotes commercial, industrial and public service land uses needed to pull together the fractured and alienated community surrounding the airport, with special consideration for the following uses: Commercial Lands should be selected to fill needs of the community including supermarkets and other commercial uses that are scarce in the project area; Industrial Land Uses should be emphasized, especially those that offer local employment opportunities and do not cause further fragmentation of the community; Public Facilities should emphasize services of value to the local population (such as local police and fire stations, training centers, health services) and avoid uses that can aggravate health conditions due to elevated pollutant and noise levels (such as active parks and swimming pools) as well as those associated with populations sensitive to health risks (such as hospitals, convalescent homes, and elementary schools). A community outreach program should be developed to solicit community input as to the exact types and locations of land uses in the mixed use project; this could be combined with the Stakeholder Process discussed below.
- 18 ►** The term 'Specific Plan Restudy' should be replaced by 'Specific Plan Amendment.' This change would instill public confidence by ensuring that

'restudy' procedures are consistent with the requirements set forth in state law concerning Specific Plans.

- 19 ►** The stakeholder process should incorporate special provisions for regular, ongoing communication between the County and the City with particular emphasis on resolution of environmental concerns impacting County residents (environmental justice, noise, air quality, traffic) and shared goals for enhanced security, regional transportation and other common objectives.

We have also identified a recommendation specifically intended to facilitate the Airport Land Use Consistency Review, which includes:

- 20 ►** In regards to noise, it is recommended that the Airport Land Use Commission find the LAX Master Plan inconsistent with the ALUP because (1) the noise contours for Alternative D include new areas outside of the LAX Planning Boundary as shown in the ALUP; (2) as a result of the Alternative D contours including new areas beyond the ALUP Planning Boundary, planning by local agencies based on the ALUP will fail to incorporate and identify all lands in the 65 CNEL and implement ALUP insulation policies accordingly; and (3) as a result of the Alternative D contours, including new areas beyond the ALUP Planning Boundary and the lack of 60 CNEL contours in the LAX Master Plan, planning by local agencies based on the ALUP will fail to incorporate and identify all lands in the 60 CNEL and ensure that notification is conducted in accordance with ALUP policy.

Finally, we repeat the recommendation that is considered most important to successful implementation of the overall LAX Master Plan process:

- 21 ►** Certification of the LAX Master Plan Final EIS/EIR must be limited exclusively and explicitly to the 'Green Light' projects as identified in the Consensus Plan (including reconfiguration and lengthening of the south runways, modified cargo facilities and the new intermodal transportation center). The certification must stipulate that all 'Yellow Light' projects (including the GTC, demolition of existing terminals and rebuilding of the CTA, the APM and auxiliary infrastructure intended to facilitate these projects) shall require supplemental environmental review prior to approval and implementation. LAWA must take whatever steps are necessary to effectuate this outcome -- including recirculation of the Master Plan EIS/EIR if required to address the environmental implications of this change.

III. IMPLICATIONS FOR CONSTRAINING GROWTH AT LAX

The Consensus Plan and Alternative E-1 offer very dissimilar approaches to the LAX Master Plan process. The difference can be briefly summarized as follows: The Consensus Plan is identical to Alternative D but incorporates a detailed implementation tool (the 'LAX Plan') that would control the phasing of Master Plan improvements at LAX. In contrast, the Parks' Plan (Alternative E-1) is a stand-alone alternative that differs substantially from Alternative D in terms of physical layout but is as yet only loosely

defined in terms of plan components and implementation. These fundamental differences set a basis for the review that follows.

As noted above, the Consensus Plan includes *all* elements of Alternative D; the Consensus Plan graphics and the language of the accompanying Specific Plan represent a mechanism to control the phasing of plan elements. Since the Consensus Plan is identical to Alternative D in terms of physical elements, it on one level elicits all of the comments and concerns previously raised by the Board of Supervisors with respect to Alternative D. The continued absence of data to support stated passenger service levels suggests that the Master Plan, as implemented by the Consensus Plan, will not constrain growth at LAX. As stated in previous comments, LAWA still has not answered the following questions:

- Why did the No Action/No Project Alternative shift from 68-72 MAP in the 1997 NOP to 78.7 MAP now?
- Why does the Existing Condition Working Paper, dated 19 April 1996, show 104 contact gates in the Central Terminal Area (CTA) while the Final EIS/EIR maintains there were 133?
- Where are the data and calculations to show that the curb frontage in the CTA constrains the No Action/No Project Alternative?

The 23 MAP increase from the existing 55 MAP to 78 MAP is a 42% increase that accounts for nearly all the regional demand over the next 20 years including the combined existing service levels for John Wayne (10 MAP), Ontario (8 MAP), and Burbank (6 MAP). Furthermore, although the 'Yellow Light' components of the Consensus Plan are designed to ensure that airport improvements do not exceed 78.9 MAP, these provisions will not constrain growth because they too are based on inflated demand levels.

Some of the same concerns apply to Alternative E-1, which seeks to "devise a safe and secure plan that ... limits the gates to 78 MAP." However, the Parks plan specifically identifies the approval of Alternative D in the Consensus Plan as a flaw, and the Parks Plan implies that only the improvements contained on its graphic would be permitted. Those improvements are very minimal and would provide little opportunity for LAX to serve additional passengers. The Parks plan may, therefore, impose a much more effective constraint on growth although verification would require more information about the Parks Plan.

In summary, both the Consensus Plan and the Parks Plan rely on the inflated levels of service that were originally established by LAWA in the No Project Alternative. As discussed in the County's previous comments on the LAX Master Plan, there is very little information regarding the genesis of the 79.8 MAP; indeed, there was only one sentence in the Master Plan documents indicating that current facilities were limited "by the capacity of the curb length in the CTA" (Alternative D is purported to be constrained by the number of gates).

► To provide a level of confidence that the Consensus Plan will place reasonable limits on passenger service, we recommend that LAX demand

projections be updated as part of a transparent analysis of the capacity of the existing facilities.

FACILITY IMPROVEMENTS AND SERVICE LEVELS REQUIRE CLARIFICATION

The Parks Plan seems resolute in its limitations on facility improvements; and, while not entirely clear, it appears that the graphic entitled "Consensus Plan" contains a limited number of facility improvements that could go forward without additional study. This analysis addresses only the improvements contained on the two graphics. (Please refer to Table 1 for a comparison of major facility improvements for Alternative D, the Consensus Plan and Parks' Alternative E-1.)

Airfield Projects: Both compromise plans allow for the separation of the south runways by 50 feet in order to permit a center taxiway to limit runway incursions and provide for the New Large Aircraft (NLA). However, the Parks Plan would move the inboard runway (25R) to the north and closer to the terminals, while the Consensus Plan proposes to move the outboard runway south towards El Segundo as proposed in Alternative D. Despite the apparent concession to El Segundo, the Parks Plan is considered infeasible because there is insufficient space for aircraft to taxi between the runway and the terminals. In order to implement the Parks scheme the piers on the south terminals would need to be shortened or reconfigured.

Neither compromise plan discusses improvements to any part of the north airfield. The easterly extension to the inboard north runway (RW 24L) was considered important in Alternative D to permit fully loaded 747 aircraft to depart. This would "balance" the airfield usage by not requiring these aircraft to taxi long distances to the south airfield where RW 25R has sufficient length. The absence of the proposed runway extension on RW 24L, and the concomitant continuation of 747's taxiing long distances to the south airfield may have significant impacts on the air quality analysis. Also, the runway extension is probably preferred by the airlines for the potential fuel savings. These same concepts apply to the NLA and should be of equal consideration.

► ***Taxi distances should be held to a minimum; we recommend a full examination of the air quality and operational issues associated with not extending RW 24L.***

Terminal/Aircraft Gate Projects: The Consensus Plan proposes to 'Green Light' the construction of additional passenger facilities and 16 gates to the Bradley Terminal including (notably) the retention of the north pier. This has the advantage of providing much needed gates for international flights and providing for both 747's and the New Larger Aircraft (NLA). Retention of the north pier may preclude, or make more difficult, the removal of the piers at Terminals 1, 2 and 3 and the new linear terminal as provided in Alternative D. (The Consensus Plan would permit the new west terminal and changes to Terminals 1, 2 and 3 after completion of a Specific Plan Study.) The Consensus Plan also shows a conversion of Terminal 8 to commuter uses (as also shown in Alternative D). This is considered improbable given the high demand for air carrier gates and that the Consensus Plan also maintains the large areas of concrete apron where commuter aircraft currently park.

The Consensus Plan makes no mention of the purported 19 remote gates and aprons where the commuter aircraft currently park. Furthermore, the Consensus Plan shows removal of the aircraft maintenance building to the west of the Bradley terminal adjacent to where commuters now park. This creates even more open space to park aircraft. As noted in earlier comments, these spaces add capacity and are used on an operational basis, do not require permits and receive no environmental review. The Parks Plan shows only the conversion of two gates at the ends of the Bradley Terminal to provide for the NLA. It is unclear if there is sufficient space in these areas without having to relocate the intersections of aircraft taxiways at the ends of the terminals.

The additional service levels provided by these improvements are not tabulated or presented. However, such limited improvements are consistent with recommendations made previously by the County.

► ***To establish more effective limitations on incremental growth at LAX, we recommend that the Consensus provide some indication of the levels of passenger service that would be accommodated by the new gates and terminal space, and require a Specific Plan Amendment for any physical improvements or operational changes proposed for the open concrete areas.***

Cargo Facilities: A serious deficiency of both plans is their lack of mention of cargo facilities: neither the Consensus nor the Parks Plan exhibits show new cargo facilities. LAX currently handles 2 million tons of air cargo (MAT). Alternative D purports to provide for one million more tons of air cargo, raising the total to 3 MAT. However, the figures are based on a very low utilization factor of one ton per square foot of cargo space -- an extrapolation of existing trends, which include older designs, and a large portion of truck-to-truck operations on the airport. New designs can increase utilization to as much as 3 tons per square foot, potentially tripling the level of cargo activity and related impacts. Currently, LAX handles virtually all the airfreight carriers in the region with the exception of consolidators such as UPS & FedEx. The regional demand forecast for air cargo is 9 MAT; there is scant evidence that other airports will be able to provide peripheral facilities to handle much of that increase.

The Specific Plan controls envisioned in the Consensus Plan use only annual passengers and peak hour traffic as constraints. Neither of these constraints would effectively govern the increased cargo flights and non-peak hour truck traffic that characterize cargo operations (including an increasing number of cargo operations during night-time hours). Furthermore, the growth in cargo operations has placed more demand to convert off airport land to air cargo warehouses, which has had an indirect impact on employment opportunities in the surrounding region.

► ***We recommend that the Consensus Plan be revised to require a Specific Plan Amendment for any cargo-related improvements that would increase total cargo handling above 3 million tons of air cargo. The requirement should incorporate a procedure for monitoring total cargo activity at LAX, including nighttime flights and 24-hour cargo delivery trip counts to monitor cargo-***

related ground transportation. Information about the proposed Parks Plan should be expanded to describe long-term cargo handling facilities.

Private Vehicle Parking: This subject was treated lightly in the LAX Master Plan and is given scant attention in the compromise plans as well. Both the Consensus Plan and Alternative E-1 incorporate little provision for private parking and seem to assume that private lots will continue to serve the need. Alternative D provided more vehicle parking in the Ground Transportation Center (GTC), but not enough to compensate for the loss of Lot C. The Consensus Plan substitutes the consolidated RAC facility for Lot C but provides no replacement parking. The Parks Plan maintains Lot C but provides no new parking.

The rampant redevelopment of off-airport land to parking spaces was never considered in the LAX Master Plan EIS/EIR despite the obvious cumulative effects on the neighboring community. Large tracts of land in Westchester, El Segundo, and along Century and Arbor Vitae Boulevards have been converted to vehicle parking and rental car facilities, supplanting jobs and homes. This trend is likely to continue. How will LAWA consolidate rental car facilities where Lot C is currently located when Hertz, Avis and others bought vast acreage along Arbor Vitae to house their facilities? Is LAWA going to buy them all up? If so, what happens to all that land?

► Both compromise plans need to compile an inventory of available parking spaces (airport owned and off-airport) and specify the location of future vehicle parking areas to accommodate an additional 23 MAP.

LAX MASTER PLAN-----COMPARISON OF ALTERNATIVE D, PARKS PLAN (E-1), AND Consensus Plan

Major Components of Alt D	Purpose/Result of Component	Included in:	
		Parks Plan?	Consensus Plan?
North Runway Separation/Center Taxiway	Reduce runway incursions, provide for NLA	No	w/SPS (specific plan study)
North Runway extensions	Balance airfield use for fully loaded 747's, provide for NLA	No	w/SPS
South Runway Separation/Center Taxiway	Reduce runway incursions, provide for NLA	Yes (but move in-board runway north)	Yes
New West Terminal	Provide approximately 30 new gates plus terminal space	No	w/SPS
New West Gates added to Bradley	Provide approximately 16 new gates plus terminal space	No (reconfigure 2 gates for NLA)	Yes. Retains north pier.
Remove Remote Gates	Decreases capacity.	Yes	Unknown
Convert Terminals 1,2 &3 to linear	Increases capacity for NLA	No	w/SPS
Convert Terminal 8 to commuters	Provides terminal access for commuters	unknown	Yes
Remove private vehicles from CTA	Increases security	No	No
Convert Lot C to RAC	Efficiency and security(?)	No	Yes
GTC @ Manchester Sq.	More terminal space, vehicle parking and security (?)	No	w/SPS "Flyaways" encouraged
Retain Lot B for surface parking	Private vehicle parking	Yes	Yes
Multi-Modal ITC	Transit Access	No (RAC)	Yes
@Aviation/Imperial			
People Mover from ITC	Vehicle free access	No	Yes
People Mover from GTC	Vehicle free access	No	w/SPS
North Side Development "Westchester South Plan"	Airport property buffers Westchester neighborhoods with clean office and commercial	More airport related dev't	Yes
Cargo buildings increased by 1msf	Provide for No Project Growth of 3 million tons/year (MAT)	No	Unknown
Components exclusive to Parks' Plan		Included in:	
		Alt. D	Consensus
Regional Transit Center at Century/Aviation	Connects busses and taxis	At Aviation/Imperial ITC	At Aviation/Imperial ITC
Greenline extension	Underground along north route through Crenshaw to Union Station	Connect to ITC	Connect to ITC
Manchester Square	Re-populate, convert to park/conference center	GTC	Unspecified

IV. SAFETY AND SECURITY FACTORS¹

The County's October 2003 comments on the LAX Master Plan Supplement to the Draft EIS/EIR raised sixty-nine separate security planning issues and questions, only 1 of which was addressed in a specific response from LAWA (regarding possible closure of Pershing Drive). Neither of the compromise plans deals specifically with the security issues raised in October 2003. Furthermore, the amount of time and information available for review of the compromise plans is substantially less than was available for the original LAX Master Plan. Our comments must be interpreted in the framework of these limitations.

General Observations: A key element of the County's earlier comments pertained to the public's unfamiliarity with security programs (and associated environmental effects) and the need for full public discourse. Quite troubling is the continuing tendency to deprive the public of the fullest practicable understanding of how their lives may be affected by security provisions in the variable circumstances that will be encountered at LAX in the future.

► ***We urge the City to devise a procedure (e.g. via a joint-public interest monitoring group) to bridge the gap between security sensitivities and public accountability. It may be possible to implement this as part of the proposed Consensus Plan Stakeholder Process.***

Security Considerations for the Consensus Plan: Performance criteria set forth in the Consensus Plan will result in a more gradual expansion than would otherwise have occurred under Alternative D. From a security point of view, the slower approach will reduce the risk of miscalculation through more thoughtful consideration of known and evolving threat scenarios, and better assimilation of future technological capabilities. The security investment program will also benefit from acting upon critical priorities anticipated to be identified in the study now being performed by the Rand Corporation.

We have continued misgivings about one particular aspect of this proposal. The County, in its original comments, agreed that LAX is a major terror target and effectively supported the Alternative D proposal to meet vehicle bomb threats. We also agreed that dispersal of crowds in the access ways to airport buildings was a desirable outcome – provided it was confirmed through analysis that configuration of pedestrian flows and building design would indeed achieve this end. Rand Issue Paper 251 (published in 2003) appears to play down, unjustifiably in our view, the threat of vehicle bombs. Effectively the Paper conveys the impression that (a) future terrorist actions can be predicted based upon past terrorism incidents; (b) the focus should be on the threat of biological and chemical attack, and small, improvised explosive devices (IEDs); and (c) the generalized mitigation principles espoused in Alternative D have little merit.

¹As noted, the Lazzaretto team met on 22 July with Council Member Miscikowski and David Kissinger, 11th District Airport Deputy, who provided a copy of the Rand Corporation Project Description, entitled "Cost Effectiveness of LAX Security Improvement Options." This Rand document has been referenced herein.

The security analyst in the Lazzaretto team conducts weekly (if not daily) updates on threat hypothesis based upon worldwide scenarios. This work includes ongoing dialogue with highly respected expert sources in the fields of improvised explosive device (IED) and military ordnance management and mitigation. As will be obvious to many, the global picture validates that vehicle bombs are a well-established and effective terrorist weapon – simple to devise, cheap, and easy to deliver to its target. Variants of the vehicle bomb remain a very popular means of terrorism. Based on the above issues, we are left wondering – why the Consensus Plan allows continued unfettered vehicular access to the Central Terminal Area? This is perceived as a major reversal of a central risk management principle embodied in Alternative D. Under the revised version, the terrorist target area will now include the Automated People Mover (APM).

► ***We recommend that the Consensus Plan and the Parks Plan address the concept of to limiting vehicular access to the Central Terminal area in accordance with evolving risk management considerations.***

Security planning for LAX will have environmental consequences that were not addressed in the LAX Master Plan EIS/EIR. Some of these concerns were raised in the County's 2003 comments on the highway access and neighborhood consequences of concentric circle security. In brief review, LAX encompasses a fully developed operational area with very limited acreage available for surface expansion. In the event of a terror attack, or a significant heightening of alert conditions, the consequential impact on roadways and adjacent neighborhoods would almost certainly create a backflow wave of congestion. The cascading nature of a real or suspected incident, and the response to either, will impose environmental conditions that for planning purposes require intense consideration, harnessing that 'imagination' referred to by the 9/11 commissioners, in the recently released report.

Airports with the benefit of more manageable approach and departure roads, or of real estate expansion space, have more flexibility than LAX to cope with these conditions. It is feasible at many airports to conduct controlled vehicle checkpoints several miles out on the approaches; in times of raised alert status, searches and 'glance and go' procedures are implemented. Application of the concentric circle concept at LAX will require that the outer limits of the security surveillance and intended control points be located inside commercial and residential areas. More broadly, the concept must also incorporate plans for responding to incidents affecting air cargo storage and transport, and the implications associated with MANPADS (shoulder fired missiles). These possibilities underscore the argument that the eventual security program must adopt a virtual perimeter, not just an operational footprint identity for the security program.

► ***Both compromise plans should be expanded to clarify how the Concentric Circle Surveillance Concept will be implemented at LAX.***

Alternative E-1 (Council Member Bernard C. Parks): The Parks Plan offers few specifics on security, but does place greater emphasis on the topic than the Consensus Plan. Retention of both the central terminal vehicular approach system and the central terminal parking facility, as shown in Alternative E-1, are questionable for reasons

already given. We do not agree with the assertion by Council Member Parks regarding the Rand postulation concerning the threat of vehicle bombs.

► *We advise strongly against reliance upon any policy that places a low priority on vehicle bombs relative to other types of attack modes and weaponry (including biological, chemical and nuclear weapons).*

Consensus Plan and Alternative E-1: Our final point on security planning applies to both options. It is not clear what structural work is intended to retain the location and services of the CTA (i.e. to what extent a retrofit versus a demolition and rebuilding will be applied). However, any proposed design should consider blast mitigation design and construction material factors. Increased standoff distances and emergency roadway allowances are essential to achieve desirable dispersal characteristics and respect the safety of pedestrians.

► *It is hoped the Rand Corporation will identify the steps required to protect the central terminal from a successful vehicle bomb attack, as well as other modes affecting the interior of the buildings.*

In general, we believe that the Rand Project will be beneficial for the purposes of arriving at a definitive policy approach for security, representing as it does a Phase 1 stage with further Phases apparently expected. To be of public value, however, a sufficient degree of accessibility to the Rand findings must be protected. It is the County's wish to be constructive in the security effort.

► *Before LAWA enters into a commitment on the security program for LAX, the County should be given an opportunity to complete a full review of the Rand Study output, and to offer comments as appropriate based on that review.*

V. TRAFFIC CONSIDERATIONS

Consensus Plan Review: In terms of circulation, the Consensus Proposal will have impacts as outlined in the LAX Master Plan EIS/EIR for Alternative D. The level of traffic will be the same, and the access points do not appear to have changed. Hence, the impacts and mitigations in the EIS/EIR will still apply, as will the comments on those impacts and mitigations formulated by the County.

The major difference is the incorporation of performance milestones. Section C (Page 19) of the Specific Plan document states that:

"1. In an effort to monitor traffic impacts and the effectiveness of mitigation measures, LADOT and LAWA shall jointly conduct traffic counts or otherwise determine the traffic impacts of Projects within the Master Plan. LADOT and LAWA shall annually report the conclusion of these studies to BOAC, City Council, and the Department of City Planning..."

The Master Plan FEIS/EIR forecasts the net new trips at full build out of the Master Plan, after implementation of mitigation measures, to be no more than 8,236 at airport peak hour. If the annual traffic generation report described above, and/or the annual traffic

generation report considered together with any Project-specific traffic study, shows that development of the Master Plan is likely to increase the trips beyond 8,236, LAWA shall complete the Specific Plan Restudy required in § 7 H of the Specific Plan.

No Specific Plan Restudy shall be required if the annual traffic generation report, and/or the annual traffic generation report considered together with any Project-specific traffic study, determines that the net new trips are anticipated to exceed 8,236 in the airport peak hour, but this increase in trips will only be temporary until the Project(s) and associated mitigation measures are complete and/or if this increase in trips is consistent with the number of trips anticipated to occur during the peak year of traffic impacts as analyzed in the Master Plan FEIS/EIR. In this case, the traffic generation report shall evaluate the effectiveness of future Projects and mitigation measures in ultimately reducing the number of net new trips to 8,236 in the airport peak hour at build-out of the Master Plan and any LAX Plan Compliance approval for a Project shall include any conditions necessary to recommended, LAWA shall include in future annual reports an analysis of the on-going effectiveness of those measures and, if the trip reduction are not effectuated, additional measures may be implemented and/or a Specific Plan restudy may be triggered.

This provision generally addresses one of the previous concerns, namely, how to monitor growth and ensure that improvements are constructed to keep pace with that growth. However, the language in the third paragraph appears to leave some loopholes, and potential impacts of unknown magnitude could occur under certain conditions. Since phasing is a key component of this new plan, and no phasing traffic analyses have been performed, the language needs to have a firm guarantee that the traffic impacts of each phase will be mitigated.

► **We recommend that the Specific Plan text be revised to replace "may" in the last sentence to "will" as shown below:**

"No Specific Plan Restudy shall be required if the annual traffic generation report, and/or the annual traffic generation report considered together with any Project-specific traffic study, determines that the net new trips are anticipated to exceed 8236 in the airport peak hour, but this increase in trips will only be temporary until the Project(s) and associated mitigation measures are complete and/or if this increase in trips is consistent with the number of trips anticipated to occur during the peak year of traffic impacts as analyzed in the Master Plan FEIS/EIR. In this case, the traffic generation report shall evaluate the effectiveness of future Projects and mitigation measures in ultimately reducing the number of net new trips to 8236 in the airport peak hour at build-out of the Master Plan and any LAX Plan Compliance approval for a Project shall include any conditions necessary to recommended, LAWA shall include in future annual reports an analysis of the on-going effectiveness of those measures and, if the trip reduction are not effectuated, additional measures will be implemented and/or a Specific Plan restudy may be triggered."

► **We also recommend that the Consensus Plan clearly define 'net new airport peak hour trips in excess of 8,236' as including all vehicle trips on all traffic lanes at key intersections utilized to access the airport. Truck trips need to be converted to Passenger Car Equivalents (PCE) when calculating the net new airport peak hour vehicle trips at these key intersections. The Consensus Plan should clearly define how the increase in annual passengers at LAX will be measured, and delineate the criteria to be used for predicting these increases.**

Review of Alternative E-1: The major difference between Alternative E-1 versus D with respect to traffic would appear to be the effect of switching the public parking and the rental car facility. The result may be a shift in access demand to the north, (although Century Boulevard will remain as a major access road since the existing parking and drop-off in the central terminal is retained). According, the Lennox interchange may not be as beneficial under the Parks Plan as in the Consensus Plan and Alternative "D."

► ***If the Lennox interchange is retained as a mitigation feature, we recommend a review of its relationship to the circulation system west of the I-405; the road system in this area may need to be reconfigured to make it fully effective.***

Overall, the Parks Plan allows for a more functional ground transportation system, with separation of activities (parking, drop-off, and rental cars) in defined areas, each of which can be served accordingly. It gives the opportunity to provide what was lacking previously, namely a clear conceptual basis for serving these three ground transportation components. The result should be greater efficiency in serving the ground transportation needs of each. Well-defined access roads with an intrinsic "logic" as to how each component needs to reach its on-site destination are essential in any airport plan; Alternative E-1 appears to have the potential for achieving that objective in a more effective manner than Alternative D.

VI. AIR QUALITY AND NOISE CONSIDERATIONS

The comments contained in this review were developed based on the limited information provided for Alternative E-1 in press releases and schematic drawings, and for the Consensus Plan, a detailed Specific Plan. None of the materials reviewed presented details of the plans, but presented only general information. None of the documents included a noise analysis or air quality analysis for their respective plan. At present, both the Parks and Consensus Plan appear to rely on the LAWA EIS/EIR and Supplemental EIS/EIR for all environmental information.

Extensive air quality and noise comments on the LAX Master Plan EIS/EIR (including the Draft EIS/EIR, the Supplemental Draft EIS/EIR, and the Final EIS/EIR) were submitted to LAWA by the County of Los Angeles Board of Supervisors. The prior comments (which are not repeated but are incorporated by reference) identified numerous deficiencies in the environmental documentation for Master Plan Alternative D. The County's comments were not adequately addressed in the Final EIS/EIR. The issue of whether existing environmental documents are sufficient to cover the Parks and Consensus Plans thus appears moot. The inadequacies identified in the County's comments are equally applicable to the Parks and Consensus Plans; neither plan contains noise or air quality information that resolves deficiencies present in the Master Plan Final EIS/EIR.

In terms of noise and air quality impacts, the Parks Plan and Consensus Plan provide no information upon which to assess the potential air quality or noise benefits that may

result. The Parks Plan is designed to limit improvements at LAX so as to accommodate less growth. To the extent that it would accomplish that goal, it is likely that the noise impacts would be reduced relative to those identified for Alternative D. However, insufficient data are available to quantify that effect.

The Consensus Plan is more difficult to assess in terms of noise and air quality. The Consensus Plan does appear to provide for further review of the more controversial components of Alternative D. These reviews may address the air and noise concerns raised in the County comments, although such guarantees are not currently evident. Furthermore, the eventual approval of Consensus Plan projects, after such further review, may still result in nearly full implementation of Alternative D; as noted in the County's comments, the noise impact of Alternative D is underestimated relative to noise levels measured and reported in the Quarterly Reports filed by LAWA. Conversely, it is possible that not all the Alternative D components would be approved if the Consensus Plan were adopted.

In short, it would be risky to adopt either the Parks Plan or Consensus Plan on the basis of the faulty Final EIS/EIR that was prepared for the LAX Master Plan. A more prudent process would be to revise the EIS/EIR to include the Parks Plan and/or the Consensus Plan, and resolve the noise and air quality deficiencies that were raised in the County's (and others') earlier comment letters. Short of this, the Consensus Plan would be improved if, as part of the component review proposed as part of the plan, noise and air quality analyses were provided that responded to the issues raised in the earlier County comments.

► *In particular, we recommend that the City of Los Angeles update the base year data for noise and air quality, and also reconcile differences between the measured and modeled noise levels; results of these efforts should be presented to the public.*

We are also concerned about the plan to eliminate extension of RW 24L. Taxiing aircraft generate significant pollutant emissions; these pollutant levels would be reduced if RW24L were extended.

► *We recommend that the City of Los Angeles reassess the proposed deletion of the RW 24L extension or reevaluate the air quality impacts associated with continued long taxi distances.*

Comments Relative to ALUC Consistency Review: Los Angeles County has adopted an Airport Land Use Plan (ALUP), prepared by the Department of Regional Planning pursuant to California State Law. The ALUP includes a "Planning Boundary" for LAX. The 'Planning Boundary' is shown on a map of the LAX area and has historically been used for planning the LAX area and represents an earlier estimate of the 65 CNEL contour for the airport. Under provisions of the ALUP and according to State Law, any project proposed in the boundary shall be compatible with the noise criteria included in the ALUP. Section IV of the ALUP includes the policies related to noise. The following policies are relevant to the review of the LAX plans:

"N-2 Require sound insulation to insure (sic) a maximum interior 45 db (sic) CNEL in new residential, educational, and health-related uses in areas subject to exterior noise levels of 65 CNEL or greater.

N-4 Encourage local agencies to adopt procedures to ensure that prospective property owners in aircraft noise exposure areas above a current or anticipated 60 dB CNEL are informed of these noise levels and of an land use restrictions associated with high noise exposure."

Further, Section VI, Plan Consistency and Implementation, includes the following section:

"AIRPORT MASTER PLANS

Before the adoption or modification of an airport master plan, (see discussion of airport master plans on page 2) the airport operator must submit the appropriate documents to the ALUC for determination of consistency."

The relevant question for the ALUC review of the LAX Master Plan is the determination of whether or not the Master Plan is consistent with the ALUP. There are 3 areas where the Master Plan is not consistent with the ALUP. These are as follows:

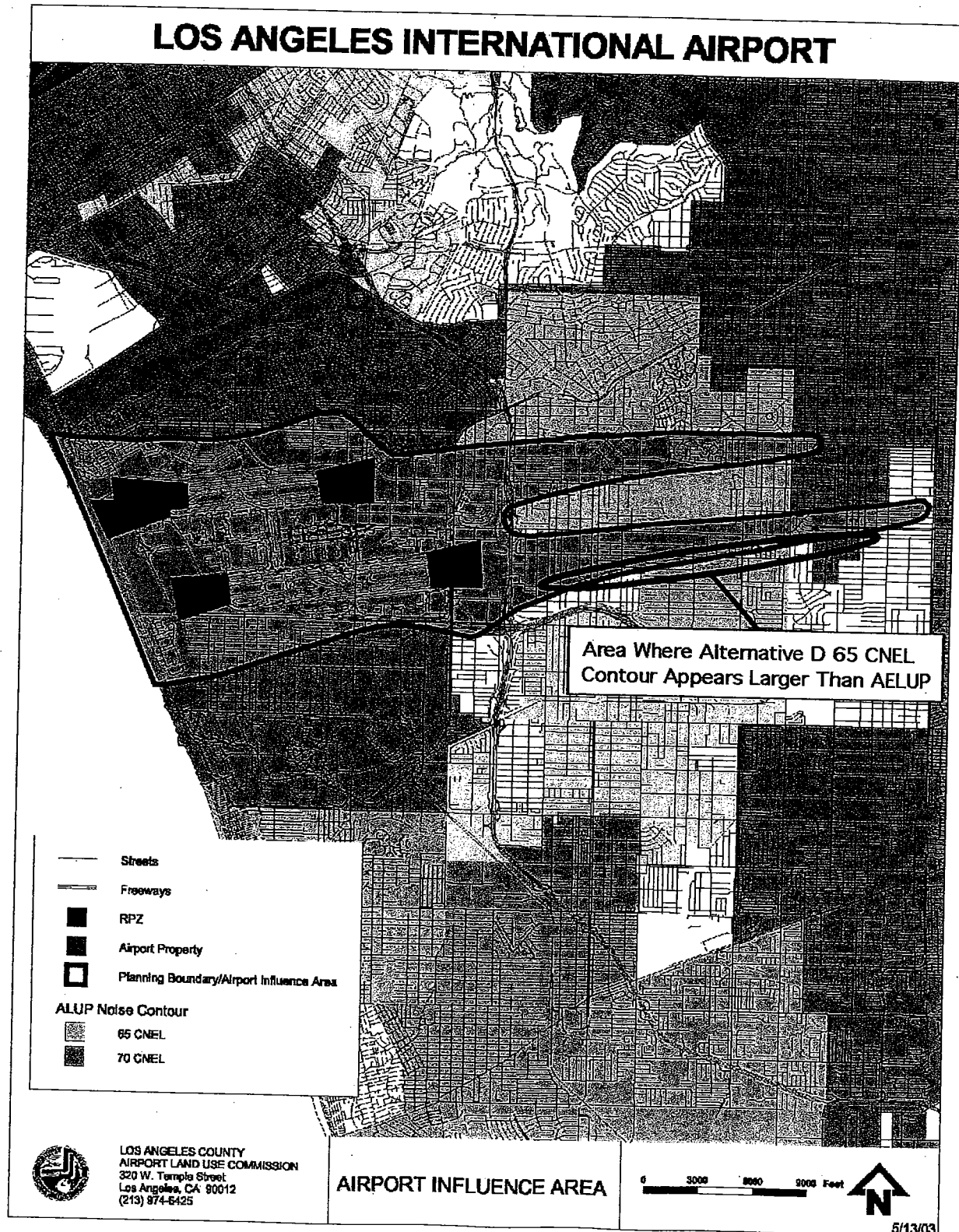
(1) Inconsistent Noise Contours: The noise contours for Alternative D are larger in at least one area of the airport than the LAX Planning Boundary that is included in the ALUP. The general area of inconsistency is shown on Figure 1. Figure 1 is taken from the ALUP and shows new areas encompassing parts of the City of Inglewood, City of Los Angeles and the unincorporated parts of the County of Los Angeles that are within the Alternative D 65 CNEL contour that are outside the Planning Boundary; however, it is clear that the areas identified are not in the Planning Boundary.

(2) Insulation Requirements: Policy N-2 identifies a policy to insulate homes within the 65 CNEL contour. Alternative D includes new land areas within the proposed 65 CNEL that are outside of the Planning Boundary.

(3) Notification: Policy N-4 identifies a policy to notify prospective homeowners of current or anticipated noise levels in excess of 60 CNEL. The LAX Master Plan and associated environmental documents do not show the 60 CNEL contour for any alternative. The lowest value shown on the contour maps is the 65 CNEL contour.

► Based on these findings, we recommend that the Airport Land Use Commission find the LAX Master Plan inconsistent with the ALUP because (1) the noise contours for Alternative D include new areas outside of the LAX Planning Boundary as shown in the ALUP; (2) as a result of the Alternative D contours including new areas beyond the ALUP Planning Boundary, planning by local agencies based on the ALUP will fail to incorporate and identify all lands in the 65 CNEL and implement ALUP insulation policies accordingly; and (3) as a result of the Alternative D contours, including new areas beyond the ALUP Planning Boundary and the lack of 60 CNEL contours in the LAX Master Plan, planning by local agencies based on the ALUP will fail to incorporate and

identify all lands in the 60 CNEL and ensure that notification is conducted in accordance with ALUP policy.



VII. ENVIRONMENTAL JUSTICE CONSIDERATIONS

Consensus Plan: As noted in the Introduction, the Lazzaretto team met on July 22 with Los Angeles City Councilwoman Cindy Miscikowski and Airport Deputy David Kissinger. In Ms. Miscikowski's presentation she described the LAX Consensus Plan as dividing up the specific components of Alternative D into two categories: 'Green Light' projects that generate little controversy and can be implemented without further review, and 'Yellow Light' projects that have been seen to elicit the most contention with respect to Alternative D. 'Green Light' projects include the reconfiguration and lengthening of the south runways, modified cargo facilities and the new intermodal transportation center. 'Yellow Light' projects include the GTC, demolition of existing terminals and rebuilding of the CTA, the APM and auxiliary infrastructure meant to facilitate these projects; all of these 'Yellow Light' projects would trigger 'Specific Plan Restudy.'

Councilwoman Miscikowski described a "Specific Plan Restudy" as further CEQA documentation and approval for the identified projects. She described that the *minimum* CEQA documentation needed in a "Specific Plan Restudy" would be a Negative Declaration requiring an Initial Study, and indicated that all projects requiring a "Specific Plan Restudy" will go through public review and public noticing procedures as required in CEQA. The Councilwoman was unclear as to the criteria and calculations needed to determine "net new airport peak hour vehicle trips and projected annual passengers utilizing the proposed improvements at LAX."

The LAX Consensus Plan is a phasing plan for Alternative D as described in the LAX Master Plan SDEIS/EIR. As such, all of the impacts associated with Alternative D would be incurred. Impacts related to environmental justice include a significant increase in noise impacting primarily minority populations in neighborhoods within an area south of Manchester Boulevard, north of Century Boulevard, west of Van Nuys Avenue, and east of the airport. The primary source of noise impacts is aircraft overflight and increased vehicle traffic. An increase in traffic congestion and related impacts will also result in primarily minority communities east of the airport.

Air quality will be degraded impacting primarily minority populations immediately east of the airport. Again, the primary source of these emissions is aircraft overflight and vehicle traffic. In addition, an increase in cancer health risk associated with Toxic Air Contaminants (TACs) will be incurred primarily impacting minority populations in census tracts 6014.02 and 2772.00 immediately east and west of Manchester Square. The primary source of TACs is vehicle traffic, construction equipment, and airport ground services support equipment.

Impacts to neighborhood compatibility include increased fragmentation of the community in neighborhoods east of the airport and the I-405 freeway related primarily to the GTC placement in the Manchester Square area. Fragmentation of the community is created by airport ground services migrating east into the Manchester Square area and traffic congestion creating further barriers to pedestrian and local traffic movement.

Continued environmental review under CEQA will be required as discussed in previous reviews of the LAX Master Plan in the documents titled "Preliminary Comments on the

LAX Master Plan Supplement to the Draft EIS/EIR” and “Comments on the LAX Master Plan Final EIS/EIR.” In this context, the CEQA documentation proposed as part of the Consensus Plan “Specific Plan Restudies” could, if implemented correctly, work well toward fulfilling environmental analysis obligations of projects under CEQA. The following recommendations would reduce impacts on environmental justice, neighborhood compatibility and land use.

► **We recommend further modifications to the Airport Noise Abatement Program. In its current form, some local agency personnel to gain access to private residences in an effort to inspect for code violations and enforcement may use the Airport Noise Abatement Program. This misuse of the program alienates the surrounding minority communities and decreases program participation rates – which ultimately results in increased noise impacts to minority communities. Training of all personnel charged with implementation of the Airport Noise Abatement Program from the various Cities and the County is needed to insure proper program implementation.**

► **We recommend that the GTC be eliminated from the Consensus Plan and that the Manchester Square area instead be used as mitigation for impacts on environmental justice and neighborhood compatibility. This mitigation should take the form of a mixed use project that promotes commercial, industrial and public service land uses needed to pull together the fractured and alienated community surrounding the airport, with special consideration for the following uses: Commercial Lands should be selected to fill needs of the community including supermarkets and other commercial uses that are scarce in the project area; Industrial Land Uses should be emphasize those that offer local employment opportunities and do not cause further fragmentation of the community; Public Facilities should draw on services of value to the local population (such as local police and fire stations, training centers, health services) and avoid uses that can aggravate health and environmental factors associated with elevated pollutants and noise levels (such as active parks and swimming pools) as well as those associated with populations sensitive to health risks (such as hospitals, convalescent homes, and elementary schools). A community outreach program should be developed to solicit input from the community as to the exact types and locations of land uses within the mixed-use project.**

Alternative E-1: In comparison with the Consensus Plan and Alternative D, the LAX Renovation and Enhancement Plan (Alternative E-1) proposed by Los Angeles City Councilman Bernard Parks is a modest approach to improvements at LAX. Overall, Alternative E-1 implements only a small portion of the improvements in Alternative D, with slight changes to the realignment of the southern runways. Alternative E-1 proposes to leave intact the existing terminal configuration with only minor adaptations to accommodate the A380 Airbus by adding double height gates at the ends of the Tom Bradley International Terminal. Limited changes to parking facilities include employee parking at the west end of LAX and a consolidated car rental facility at the southeast corner of the airport. The existing parking at the CTA and long-term parking area would remain intact.

Under this alternative the north runways would remain, as they exist now. The south runways would be lengthened and the southern runway closest to the CTA would be shifted 50 feet north (closer to the CTA) to accommodate a taxiway between the two runways and reduce runway incursions. Alternative E-1 also proposes a public park and conference center in the area designated for the GTC and APM in Alternative D. The text of this alternative does not explain how, or if, these changes are consistent with the existing SDEIS/EIR, FEIS/EIR, or what additional environmental review will be required for approval of this alternative. Also missing in this alternative is traffic control or roadway improvements.

Alternative E-1 eliminates a number of the facility improvements shown in the preferred Master Plan Alternative D. Noise impacts to minority communities would be greatly reduced, primarily through elimination of the longer northern runways shown in Alternative D. However, impacts related to air quality, cancer risk, traffic and neighborhood compatibility would be similar, and in some cases worse, than those associated with Alternative D. The reason for this is that Alternative E-1 does not supply the air traffic infrastructure and roadway improvements necessary to accommodate the anticipated increase in passenger and cargo demand at LAX, or facilitate the transition of the increase in air traffic demand to other regional airports. As such, the Parks Plan would result in increased congestion of both aircraft and vehicles. In turn, the added congestion would cause an increase in idling time, which would increase air pollutant emissions.

LAX would be the primary beneficiary of the proposed public park and conference center in Manchester Square, since largely visitors from outside the area would populate conventions and conferences held in this area. The conference center would further increase traffic congestion and be of little value to neighborhood communities surrounding the airport. While the public park has some value to the neighborhoods, the use of parks by local residents would also exacerbate health-related issues due to the increased noise, air pollution and cancer risks associated with LAX expansion. In whole, the available information suggests that Alternative E-1 may have more adverse traffic and pollutant impacts than Alternative D or the Consensus Plan. Alternative E-1 is therefore not recommended in terms of environmental justice.

VIII. CEQA, NEPA & PLANNING COMPLIANCE FACTORS

Environmental Clearance: *The fact that the Consensus Plan is broadly consistent with Preferred Alternative D in terms of physical components establishes a reasonable basis, in terms of the project description, for finding that the existing LAX Master Plan EIS/EIR may be used to approve the Consensus Plan without further study or public review in support of the initial approval. Furthermore, our review confirms that the Consensus Plan does address and resolve a number of concerns raised in the County's earlier comment letters. However, these considerations do not alter the fact that the Consensus Plan is an embodiment of Master Plan Alternative D, which in turn is based on a seriously flawed and inadequate Final EIS/EIR.*

In contrast, Alternative E-1 deletes numerous elements that are part of Alternative D, and incorporates some new elements that are not part of Alternative D. The environmental effects associated with Alternative E-1 have not been previously evaluated under CEQA or NEPA, but are subject to such analyses. Consequently, Alternative E-1 could not be approved without first completing further environmental analyses and recirculating the LAX Master Plan EIS/EIR for review and comment. Until such studies are complete it is not certain whether Alternative E-1 would represent a substantial improvement over Alternative D in terms of the environmental issues of concern previously raised by the County. These considerations would have a direct bearing on the timeline for initiating Master Plan changes at LAX, since the required CEQA and NEPA review of Alternative E-1 would add months and possibly years to the overall timeframe.

Specific Plan Restudy: The Consensus Plan triggers are currently presented in terms of mandatory 'Specific Plan Restudy' requirements. The LAX Consensus Plan requires a "Specific Plan Restudy" for the following components of Alternative D before approval can be granted for these projects:

- The Ground Transportation Center (GTC) east of Aviation Boulevard,
- The Central Terminal Area (CTA) Terminals 1 through 3,
- Automated People Mover (APM) number 2 connecting the GTC to the CTA,
- Westside Satellite Concourse and associated APM segments,
- North Runway reconfiguration as presented in Alternative D including center taxiways, and
- Traffic control and roadway improvements associated with the GTC and APM #2.

A "Specific Plan Restudy" is also initiated if any of the Alternative D components are anticipated to *"generate net new airport peak hour trips in excess of 8,236 (unless the total trips for that year are related to peak year traffic impacts)"* or if annual aviation activity analysis determines that annual passengers for that year are anticipated to exceed 78.9 million.

The process for a "Specific Plan Restudy" is not defined in the Consensus Plan, and there is nothing in the California Government Code that corresponds to this terminology. The specific criteria for initiating restudy (other than the general topics security, traffic and aviation activity) are left undefined. Additional environmental review under CEQA is not mentioned, and also left undefined are thresholds and criteria used in determining approval of a project once a "Specific Plan Restudy" is completed.

► **We recommend that the text be reworded to replace 'Specific Plan Restudy' with 'Specific Plan Amendment.' This change would instill confidence by ensuring that restudy efforts are consistent with the broad requirements set forth in state law, including public notification and review.**

Stakeholder Participation: Councilwoman Miscikowski has indicated her goal to integrate a Stakeholder Review process into the Specific Plan with special focus on the

identified Specific Plan triggers, and she is seeking models for the structure and management of the stakeholder process.

► **It is recommended that the this stakeholder process incorporate special provisions for regular, ongoing communication between the County and the City with particular emphasis on resolution of environmental concerns impacting County residents (environmental justice, noise, air quality, traffic) and supporting shared goals for enhanced safety and security, regional transportation and other common objectives. This process could include the joint public interest group to monitor security and public accountability, as recommended in the discussion of Safety and Security Factors.**

IX. LOS ANGELES COUNTY DEPARTMENT OF PUBLIC WORKS

TRAFFIC AND LIGHTING DIVISION

LAX MASTER PLAN

August 4, 2004

As requested, we reviewed alternative plans by Councilmembers Miscikowski and Parks from a traffic and transportation point of view.

The Alternative Plan by Councilmember Miscikowski:

The alternative plan by Councilmember Miscikowski is also referred to as the "Consensus" plan. The Consensus plan is a modified plan designed to serve approximately 78 MAP. Elements of the Consensus Plan are contained in the document, Los Angeles International Airport Specific Plan, dated June 11, 2004.

The Consensus Plan maintains many elements of Alternative D. It "green lights" or gives the go-ahead to several transportation elements of Alternative D, including the Consolidated Rental Car Facility (RAC), the Intermodal Transportation Center (ITC), the Employee Parking area, and the people mover. It "yellow lights" or requires new studies other transportation elements of Alternative D, primarily the Ground Transportation Center (GTC) in Manchester Square, which was proposed to be the primary pick-up and drop-off area and accommodate parking in three parking structures.

To limit growth of LAX to 78 MAP, the Plan requires a traffic generation report to identify the current number of trips generated by LAX, and the number of trips anticipated to be generated at the completion of any Master Plan projects. It requires LADOT and LAWA to jointly conduct traffic counts to determine the impacts of projects within the Master Plan. New peak-hour trips for the Master Plan are to be limited to 8236. If development of the Master Plan increases the trips beyond 8236, LAWA is required to complete a Specific Plan Restudy.

In the Consensus Plan the ITC is retained and the GTC is yellow lighted. There is some parking planned for ITC; however, it appears the ITC would not have sufficient parking to accommodate the parking lost in Public Parking Lot C when that land is used for the planned RAC. It appears additional parking will be needed in an expanded ITC and/or by the construction of a parking structure in existing Parking Lot B, which is now a surface parking lot. Access to these parking facilities in the vicinity of the intersection of La Cienega Boulevard and Imperial Highway will add traffic demands and impact La Cienega Boulevard, Imperial Highway and intersections along these highways.

Similar to our recommendation for Alternative D, the County's proposed LAX interchange on the San Diego Freeway at Lennox Boulevard and the proposed interchange on the 105 Freeway providing direct access to LAX are needed to mitigate the Consensus plan's traffic impacts on highways in the unincorporated Lennox community and City of Los Angeles. These freeway

connections would also enhance access to LAX. Parking lot B would have to be modified to accommodate the new interchange and a new access road between the San Diego Freeway and the internal north-south access road. With the inclusion of the LAX interchange at Lennox Boulevard, the Department of Public Works believes the traffic impacts of the Consensus plan can be mitigated.

The Alternative Plan by Councilmember Parks:

Councilmember Parks' Plan is referred to as Alternative E. Information from the Councilmember's office states the plan will have the following benefits for traffic flow:

1. Reduces traffic infusion into neighborhoods by facilitation better freeway access.
2. Provides intermodal connectivity so that people can get to all parts of Southern California via rapid transit, busses and trains. Extends "Green Line" or other trains to downtown Los Angeles for connection to all of California.
3. Some streets such as Aviation Boulevard are placed below grade to reduce intersection impacts.
4. Consolidated rental car facility improvements of Alternative D is maintained, but in a better location.

Similar to Alternative D, Alternative E keeps autos out of the Central Terminal Area. Alternative D's single pick-up and drop-off area in Manchester Square would be replaced by two check-in facilities in other locations.

Alternative E's proposed consolidated car rental facility on the north side of Imperial Highway west of La Cienega Boulevard and the proposed Park and Conference Center in the Manchester Square area would place additional traffic demands on La Cienega Boulevard and Imperial Highway, without any apparent traffic mitigation measures. The master plan layout for Alternative E does not show any new internal access roads. Therefore, it appears there could be no direct access between the freeway system and any LAX facilities. That would preclude the possibility of the County's proposed LAX interchange on the San Diego Freeway at Lennox Boulevard or a direct access between LAX and the I-105 Freeway. We believe these interchanges are needed to mitigate the traffic impact of any of the LAX alternatives and to facilitate access to LAX. Unless other mitigation measures are identified, the Department of Public Works finds Alternative E undesirable from a traffic and circulation standpoint.

BK: 8.4.04